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September 30, 2014

Hon. Cathy Seibel
United States District Court
300 Quarropas Street
White Plains, New York 10601

**Re: Bloomingburg Jewish Education Center et al v. Village of Bloomingburg
Docket No. 14-CV-7250 (CS)**

Dear Judge Seibel:

We represent Defendants Town of Mamakating, the Town Board of the Town of Mamakating, the Planning Board of the Town of Mamakating and William Hermann in the above matter. We were recently retained to represent those Defendants in the action. It is my understanding that the complaint was served on one or more of the Town Defendants on or about August 30, 2014.

The complaint consists of more than 60 pages and 285 paragraphs. Numerous factual allegations regarding purported multiple events and claimed wrongdoing are asserted. The complaint asserts 15 causes of action, including six claims pursuant to the Religious Land Use and Institutionalized Persons Act, two Fair Housing Act claims, two First Amendment claims, a due process claim, three equal protection claims, a claim asserting violations of various provisions of the New York State Constitution and a state law claim challenging a moratorium adopted by the Village.

I have spoken to various Town officials and in the process of ascertaining the facts with respect to the voluminous allegations of the complaint and intend to research the various claims once the facts are known to me. I clearly cannot do so within the time provided by the Federal Rules. In addition, I have at least six motions or appeals that must be filed in October in other matters. Consequently, I respectfully request that the foregoing Defendants' time to answer or to file a pre-motion letter be enlarged to and including November 14, 2014. I did speak to Stephen Engel, one of the Plaintiffs' attorneys, and he was agreeable to an enlargement only to October 15, 2014. However, I advised him that that was insufficient and it was agreed that I would request additional time from the Court.

Thank you for your consideration.

Very truly yours,

Terry Rice

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TR-wp-0930/154-55

cc: Dechert LLP

Whiteman Osterman & Hanna LLP